

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHARLES GOLBERT, COOK COUNTY PUBLIC	)	
GUARDIAN, ET AL.,	)	Case No. 1:23-cv-00300
	)	
Plaintiff,	)	
	)	
v.	)	Honorable Martha M. Pacold
	)	Magistrate Judge Gabriel A. Fuentes
MARC D. SMITH, ET AL.,	)	
	)	
Defendants.	)	

**JOINT STATUS REPORT REGARDING AGREED DISCOVERY STAY**

Defendants moved to stay discovery in this case pending resolution of their Motion to Dismiss and Motion to Strike Class Allegations. Dkt. 24. Plaintiffs responded to the Motion to Stay on July 25, 2023, Dkt. 28, and the Court issued a preliminary order on July 26, Dkt. 30. The Court advised that the parties could confer in light of its preliminary order, and that if they reached an agreement they could inform the Court in lieu of the Defendants filing a Reply. *Id.* at 4. The parties submit this joint status report to describe the agreed stay and the agreed parameters of limited discovery.

The parties agree that discovery in this case will be stayed pursuant to an Order entered by the Court, until Defendants' Motion to Dismiss and Motion to Strike Class Allegations is resolved, and that neither party will seek further discovery until such resolution, with the following exceptions. Defendant DCFS will provide Plaintiffs' counsel with the names and last known addresses of Release Upon Request ("RUR") youth who were held RUR for 7 days or more from January 2018 to January 19, 2023. The parties anticipate that DCFS will produce this information within the next three to four weeks.

Dated: August 10, 2023

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Respectfully submitted,

KWAME RAOUL  
Illinois Attorney General

By: s/Thomas J. Verticchio  
Thomas J. Verticchio

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that, on August 10, 2023, he caused to be filed through the Court's CM/ECF system a copy of Joint Status Report Regarding Agreed Discovery Stay. Parties of record may obtain a copy of this filing through the Court's CM/ECF system.

/s/ Thomas J. Verticchio

Thomas J. Verticchio